

Exhibit “1”

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DISCOVERY

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

HARRY GINGOLD, MONIQUE GINGOLD,
NAHAL KEDUMIM, LLC, their successors
and their assignees, inclusive,

Case No. 3:19-cv-00532

Plaintiffs,

v.

ITRONICS INC., its successors and its
assignees,

Defendants.

**ANSWER TO JUDGMENT CREDITORS' FIRST SET OF INTERROGATORIES TO
ITRONICS INC. IN AID OF EXECUTION OF JUDGMENT**

ITRONICS INC., ("Itronics") by and through its counsel, Woodburn and Wedge,
hereby answers to Judgment Creditors HARRY GINGOLD, MONIQUE GINGOLD,
NAHAL KEDUMM, LLS's First Set of Interrogatories as follows:

INTERROGATORY NO. 1:

Identify the name, address, and position of all Persons who assisted in preparation of
responses to these Interrogatories, including each person's name, address, telephone number
and relationship to You. If any or all Persons assisting in the preparation hereof assisted with
respect to all of the Interrogatories, then state the fact. Otherwise, identify the specific
Interrogatory No. that each Person assisted in the response of.

ANSWER TO INTERROGATORY NO. 1:

Michael Horsley

1 Controller
2 6490 So. McCarran Blvd, Ste 23
3 Reno, NV 89509
4 (775) 689-7696

5 Mr. Horsley assisted in the preparation of the answers to all the Interrogatories.

6 **INTERROGATORY NO. 2:**

7 Identify Your employer identification number.

8 **ANSWER TO INTERROGATORY NO. 2:**

9 Employer ID No. is 75-2198369

10 **INTERROGATORY NO. 3:**

11 Describe, in as much detail as possible, each foreign or domestic bank account or
12 investment You hold or have held since January 1, 2010, including:

13 (A) The name of the bank or other financial institution where the account was held;

14 (B) The address of the bank or other financial institution where the account was
15 held;

16 (C) The Telephone number of the bank or other financial institution where the
17 account was held;

18 (D) The type of account (e.g. checking, savings, investment, ect.)

19 (E) The date on which the account was opened;

20 (F) The date on which the account was closed;

21 (G) The account number; and

22 (H) The name used on the account.

23 **ANSWER TO INTERROGATORY NO. 3:**

24 Bank account:

25 (A) Bank of America, NA

26 (B) 5905 So. Virginia
27 Reno, NV 89502

28 (C) (800) 432-1000

1 (D) Checking

2 (E) Unknown-prior to 2010

3 (F) N/A

4 (G) 000323133189

5 (H) Itronics Inc.

6 **INTERROGATORY NO. 4:**

7 Describe, in as much detail as possible, each payment of money made to You since
8 January 1, 2010, including:

9 (A) The name of the individual, company, employer, or entity that made the
10 payment;

11 (B) The address of the individual, company, employer, or entity that made the
12 payment;

13 (C) The telephone number of the individual, company, employer, or entity that
14 made the payment;

15 (D) The amount of the payment;

16 (E) The date on which the payment was made;

17 (F) The reason the payment was made; and

18 (G) The value of the consideration You provided in exchange for the payment.

19 **ANSWER TO INTERROGATORY NO. 4:**

20 Itronics objects to the requested discovery. Pursuant to NRCP 26(b)(1) the request is
21 not within the scope of allowed discovery because the requested time frame of going back
22 thirteen years will not produce usable information.

23 Itronics is willing to produce the requested document or information for 2022 to
24 current. See document no. ITRO 000157, listing all deposits to the bank account from January
25 1, 2022, to April 5, 2023.

26 **INTERROGATORY NO. 5:**

27 Identify all current accounts receivable due to You by stating, among other things, the
28 name, address, and amount due on each receivable.

ANSWER TO INTERROGATORY NO. 5:

None.

INTERROGATORY NO. 6:

Describe, in as much detail as possible, all real property in which You hold, or have held since January 1, 2010, any legal or beneficial interest, including:

- (A) The address of the property, including city, county, and state;
- (B) The owner or owners of the property;
- (C) The use to which the property is or was being utilized;
- (D) The amount of income derived from Your interest in the property; and
- (E) The value of Your interest in the property or, if You no longer hold any interest in the property, the value of Your interest in the property on the day your interest terminated.

ANSWER TO INTERROGATORY NO. 6:

None.

INTERROGATORY NO. 7:

Describe, in as much detail as possible, all real property which You sold, conveyed, or encumbered since January 1, 2010, any legal or beneficial interest, including:

- (A) The address of the property, including city, county, and state;
- (B) The person(s) to whom Your interest was sold, conveyed, or encumbered;
- (C) The amount and type of compensation You received for Your interest; and
- (D) The disposition of any proceeds You received for Your interest.

ANSWER TO INTERROGATORY NO. 7:

None.

INTERROGATORY NO. 8:

Identify any and all physical assets You have owned since January 1, 2010, until the present by stating, including but not limited to, their present location, if any asset is subject to a lien, the name and address of the lien-holder, the amount due on the lien, when the asset was

1 acquired, when You ceased having an ownership interest in the asset, and why You ceased
2 having an ownership interest in the asset

3 **ANSWER TO INTERROGATORY NO. 8:**

4 Itronics objects to the requested discovery. Pursuant to NRCP 26(b)(1) the request is
5 not within the scope of allowed discovery because the requested time frame of going back
6 thirteen years will not produce usable information. Itronics is willing to produce the requested
7 documents or information for the last five years.

8 None.

9 **INTERROGATORY NO. 9:**

10 Identify all transfers of Your assets, including real property, personal property, and
11 intangibles, with a value in excess of \$500.00 that have occurred since January 1, 2010, by
12 stating, among other things:

13 (A) the nature of the asset;

14 (B) when you acquired the asset;

15 (C) the date of transfer;

16 (D) name and address of the person to whom the asset was transferred;

17 (E) the consideration paid for the asset and the form in which it was paid (check, cash,
18 etc.); and

19 (E) explain in detail the disposition of the proceeds received for the asset

20 **ANSWER TO INTERROGATORY NO. 9:**

21 None.

22 **INTERROGATORY NO. 10:**

23 Identify each automobile/vehicle You have owned or leased since January 1, 2010, by
24 stating:

25 (A) The vehicle's make, model, and year;

26 (B) The vehicle's license plate number;

27 (C) When you purchases/leased it;

1 (D) The amount for which You purchased/leased it;

2 (E) Whether You currently own the vehicle;

3 (F) If you do not own the vehicle, when You sold the vehicle;

4 (G) The amount for which You sold the vehicle; and

5 (H) To whom You sold the vehicle.

6 **ANSWER TO INTERROGATORY NO. 10:**

7 None.

8 **INTERROGATORY NO. 11:**

9 Identify all boats and/or any type of watercraft owned by You since January 1, 2010,
10 to the present by stating the following for each: (a) make, model and year of the boat and/or
11 watercraft; (b) the address of where such boat and/or watercraft is or was last located; (c) if
12 there is a lien on the boat and/or watercraft, state the name and address of the lien-holder and
13 the amount due to lien-holder; (d) when the watercraft was acquired; (e) when Your
14 ownership in the watercraft ceased; and (e) why Your ownership in the watercraft ceased.

15 **ANSWER TO INTERROGATORY NO. 11:**

16 None.

17 **INTERROGATORY NO. 12:**

18 Identify all equipment or machinery owned by You since January 1, 2010, to the
19 present by stating the following for each such piece of equipment owned: (a) make, model,
20 and year of the equipment; (b) the location of the equipment; (c) if there is a lien on the
21 equipment, state the name and address of the lien-holder and the amount due to the lien-
22 holder; (d) serial number or vehicle identification number; (e) when You acquired Your
23 ownership interest in the equipment or machinery; and (f) when Your ownership interest
24 ceased; and (g) why Your ownership interest ceased.

25 :::

26 :::

27 :::

1 **ANSWER TO INTERROGATORY NO. 12:**

2 Itronics objects to the requested discovery. Pursuant to NRCP 26(b)(1) the request is
3 not within the scope of allowed discovery because the requested time frame of going back
4 thirteen years will not produce usable information. Itronics is willing to produce the requested
5 documents or information for the last five years.

6 None.

7 **INTERROGATORY NO. 13:**

8 Identify Your monthly expenses in detail beginning January 1, 2010, until the present
9 by stating each obligation, amount, and when that obligation was typically due each month.

10 **ANSWER TO INTERROGATORY NO. 13:**

11 Itronics objects to the requested discovery. Pursuant to NRCP 26(b)(1) the request is
12 not within the scope of allowed discovery because the requested time frame of going back
13 thirteen years will not produce usable information.

14 Itronics is willing to produce the requested document or information for 2022 to
15 current. See document no. ITRO 000157 listing the Quarterly expenses for the period January
16 2022 to March 2023. Various accrual entries are completed through December 31, 2022.

17 **INTERROGATORY NO. 14:**

18 Describe in detail the sources of funds or money You used to pay Your monthly
19 expenses beginning in 2010 until the present.

20 **ANSWER TO INTERROGATORY NO. 14:**

21 See answer to No. 4.

22 **INTERROGATORY NO. 15:**

23 Identify every person or entity that owes You money or have owed You money since
24 January 1, 2010, by stating the person's or entity's name, the amount owed, the last payment
25 made, and why that person or entity owes You money.

26 **ANSWER TO INTERROGATORY NO. 15:**

27 None.

1 **INTERROGATORY NO. 16:**

2 Identify all ownership interests You have in any business since January 1, 2010, to the
3 present by stating, among other things, the following: (a) name and address of the business;
4 (b) whether the business is a corporation, sole proprietorship, limited liability company, a
5 partnership, etc.; (c) the name, address, and title of all stockholders, officers, and/or partners;
6 (d) the amount of income received by You from the business during the last thirty-six months;
7 (e) when You acquired Your interest; (f) when Your ownership interest ceased; and (g) why
8 Your interest ceased.

9 **ANSWER TO INTERROGATORY NO. 16:**

10 1. (A) Whitney & Whitney, Inc.
11 6490 So. McCarran Blvd, Ste 23
12 Reno, NV 89509

13 (B) Corporation

14 (C) wholly owned by Itronics Inc. John W Whitney is President, Secretary and Treasurer.

15 (D) None

16 (E) Prior to 2010

17 (F) N/A

18 (G) N/A

19 2. (A) Itronics Metallurgical, Inc.
20 6490 So McCarran Blvd, Ste 23
21 Reno, NV 89509

22 (B) Corporation

23 (C) Wholly owned by Itronics Inc. John W Whitney is President, Secretary and Treasurer

24 (D) None

25 (E) Prior to 2010

26 (F) N/A

27 (G) N/A

28 3. (A) Nevada Hydrometallurgical Project
6490 So. McCarran Blvd, Ste 23
Reno, NV 89509

1 (B) Partnership

2 (C) Itronics own 92.5%; other partners are Nevada Metallurgical Company and JRW Co.

3 (D) None

4 (E) Prior to 2010

5 (F) N/A

6 (G) N/A

7 4. (A) American Gold & Silver Limited
6490 So McCarran Blvd, Ste 23
8 Reno, NV 89509

9 (B) Limited partnership

10 (C) Itronics is a limited partner with 36.577% ownership; Whitney & Whitney, Inc. is the
11 general partner; numerous individuals are limited partners.

12 (D) None

13 (E) Prior to 2010

14 (F) N/A

15 (G) N/A

16 **INTERROGATORY NO. 17:**

17 Identify all pending jobs, executed contracts, executed subcontracts, or any pending
18 bids that have been submitted by You for any work of any kind, stating the project name and
19 address of each job or bid, and the value/amount of each contract, subcontract, or bid.

20 **ANSWER TO INTERROGATORY NO. 17:**

21 None.

22 **INTERROGATORY NO. 18:**

23 Identify all judgments or liens that have been entered against You since January 1,
24 2010, by stating, among other things: (a) the creditor's name; (b) creditor's attorney; (c)
25 amount due; (d) name of court; and (e) docket number or case number.

26 **ANSWER TO INTERROGATORY NO. 18:**

27 1. Harry Gingold et al. -the subject of this interrogatory.
28

1 2. (A) AJW Partners LLC et al

2 (B) Olshan Grundman Frome Rosenzweig & Wolosky LLP

3 Thomas J Fleming

4 (C) \$7,633,316; The original Notes and security agreements provided that all assets of
5 Itronics Inc. and Subsidiaries are collateral for the loans.

6 (D) Supreme Court of the State of New York

7 (E) 602987/2008

8 **INTERROGATORY NO. 19:**

9 Identify all litigation in which You are presently involved by stating, among other
10 things: (a) date litigation commenced; (b) name of party who commenced the litigation; (c)
11 nature of the actions; (d) names of all parties and the names, addresses and telephone numbers
12 of their attorneys; (e) trial date; (f) status of case; and (g) name of the court and docket
13 number.

14 **ANSWER TO INTERROGATORY NO. 19:**

15 None, other than the Gingold case.

16 **INTERROGATORY NO. 20:**

17 Identify each and every accountant(s), financial advisor(s), and/or lawyer(s) You have
18 retained or consulted since January 1, 2010, by stating, among other things: (a) the name; (b)
19 the address; (c) the email address of each person; (d) the phone number of each person; and
20 (e) and the reason for Your retention and/or consultation with each person.

21 **ANSWER TO INTERROGATORY NO. 20:**

22 Itronics objects to the requested discovery. Pursuant to NRCP 26(b)(1) the request is not
23 within the scope of allowed discovery because the requested time frame of going back
24 thirteen years will not produce usable information. Itronics is willing to produce the requested
25 documents or information for the last five years.

26 Legal counsel

- 27 1. Woodburn and Wedge
28 Chris Wicker

1 6100 Neil Road, Suite 500
2 Reno, NV 89505
3 (775) 688-3000
4 WWicker@woodburnandwedge.com
5 General corporate counsel-engaged prior to 2010

6 2. David Adkins
7 611 Sierra Rose Dr, Ste B
8 Reno, NV 89511
9 Engaged November 2016 to November 2019
10 Prepared Rule 144 documents

11 3. Securities Counselors, Inc.
12 401 Lake Cook Road
13 Deerfield, IL 60015
14 Engaged in March 2021

15 Assisted in planning for completing the audits and filing a Reg A registration in order to
16 get Itronics' stock trading again. Work is on hold until funds can be obtained to move forward
17 with the audit.

18 Accountants

19 1. Daskal Bolton LLP
20 Scott Walters
21 490 Sawgrass Corporate Pkwy, Suite 200
22 Sunrise, FL 33325
23 (561) 886-5287
24 swalters@dbllp.com

25 Originally engaged in June 2021 to perform annual audits for the 2019/2020 period. Due
26 to lack of funds, field work on the audits has not begun. In February 2023 the auditors
27 disengaged as required due to the length of time with no progress. Mr. Walters will consider
28 reengaging at such time as Itronics is able to continue with the audits.

29 INTERROGATORY NO. 21:

30 Identify all insurance policies held by You and all documents showing payments for
31 the premiums thereof.

32 ANSWER TO INTERROGATORY NO. 21:

33 None.

34 :::

1 **INTERROGATORY NO. 22:**

2 Identify each company You use to facilitate your processing of credit cards for
3 payment to You including a credit card processing company and each account in which credit
4 card funds settle.

5 **ANSWER TO INTERROGATORY NO. 22:**

6 N/A.

7 **Affirmation pursuant to NRS 239B.030**

8 The undersigned does hereby affirm that the preceding document does not contain the
9 personal information of any person.

10 DATED: this 12 day of April, 2023.

11 WOODBURN AND WEDGE

12 By  #16011

13 W. Chris Wicker, Esq. [NV Bar # 1037]
14 *Attorneys for Itronics*

VERIFICATION

I, Michael Horsley, declare under the penalty of perjury under the law of the State of Nevada that I am an officer of Itronics Inc., I have read the foregoing Answer to Judgment Creditors' First Set of Interrogatories to Itronics Inc. in Aid of Execution of Judgment. I know the contents thereof and that the same is true of my own knowledge, except as to those matters therein stated upon information and belief, and as to such matters, I believe them to be true and correct.

ITRONICS INC.

By: Michael Horsley

Name: Michael Horsley

Its: Controller

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Woodburn and Wedge and that on this date, I caused to be sent via CM/ECF electronic service, unless otherwise indicated, a true and correct copy of the **ANSWER TO JUDGMENT CREDITORS' FIRST SET OF INTERROGATORIES TO ITRONICS INC., IN AID OF EXECUTION OF JUDGMENT** to:

GUNDESON LAW FIRM
Austin K. Sweet, Esq.
3895 Warren Way
Reno, NV 89509
asweet@gundersonlaw.com

DATED this 12th day of April, 2023.

By: 
An Employee of Woodburn and Wedge